

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

HARVEY MILLER and TODD K. LAMUNYON, individually, and as Representatives of a Class of Participants and Beneficiaries of the Packaging Corporation of America Retirement Savings Plan For Salaried Employees,

Case No: 1:22-cv-00271

Judge Hala Y. Jarbou

Plaintiffs,

Magistrate Judge Ray Kent

v.

PACKAGING CORPORATION OF AMERICA, INC., et al.

Defendants

JOINT STATUS REPORT AND REQUEST FOR STAY

Plaintiffs, Harvey Miller and Todd K. Lamunyon (“Plaintiffs”), and Defendants Packaging Corporation of America, Inc., the Board of Directors of Packaging Corporation of America, Inc., Mark W. Kowlzan, Cheryl K. Beebe, Duane Farrington, Donna A. Harman, Robert C. Lyons, Thomas P. Maurer, Samuel M. Mencoff, Roger B. Porter, Thomas A. Souleles, Paul T. Stecko, Investment Committee Of The Packaging Corporation Of America, Inc., Michelle Wojdyla, Robert P. Mundy, And Pamela A. Barnes (“Defendants”) (Plaintiffs and Defendants collectively referred to as the “Parties”), through their respective counsel, hereby file this Joint Status Report and Request for Stay and state:

1. On July 5, 2023, the Parties participated in a mediation before Robert A. Meyer, a nationally known JAMS mediator.
2. The Parties agreed to a settlement in principle, that will resolve this ERISA class

action in its entirety.

3. The Parties are collaborating on a comprehensive settlement agreement and other pleadings that will effectuate this class action settlement.

4. The Parties anticipate filing a Motion for Preliminary Approval of Settlement together with all exhibits and ancillary pleadings on or before September 22, 2023.

5. In conjunction with the Motion for Preliminary Approval of Settlement, on or before September 22, 2023, the parties will submit a proposed class notice, a proposed schedule for the mailing of class notice, a proposed schedule for the filing of class member objections (if any), a proposed date for the final fairness hearing, and other matters to be accomplished to complete this ERISA class actions settlement.

6. The Parties request that the Court enter a stay until the settlement is finalized.

SO ORDERED that the Court will Stay these Proceedings while the Parties complete all tasks necessary to finalize the settlement of this matter.

Dated: July 7, 2023

/s/ Hala Y. Jarbou

HALA Y. JARBOU

Chief United States District Judge

WE HEREBY AGREE TO THE CONTENTS:

Dated: July 7, 2023

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